City of Union
P O Box 987
101 Sharpe Avenue
Union, South Carolina 29379

July 15, 2021

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, SC 29210

RE: Docket No 2021-66-A

Dear Ms. Boyd:

Governor Henry McMaster recently requested that the South Carolina Office of Regulatory Staff review and evaluate South Carolina's public and private power grid and its ability to withstand potential ice storms and other dangerous weather conditions.

On June 22, 2021, the City of Union received a request from the Public Service Commission encouraging non-regulated natural gas authorities to participate in this process by providing the requested information.

This letter contains the City of Union's response to the above request with information detailing the history of the City of Union's Natural Gas System, the identification of potential threats to the utility service and the impact of potential threats to the utility service.

The City of Union owns and operates a natural gas distribution system which commenced service in 1956. It consists of one purchase point connected to a main transmission line owned and operated by Williams Company - Transcontinental Gas Pipeline Corporation (Transco). The natural gas distribution system consists of 427 miles of 2" – 10" diameter mains and approximately 6,325 service lines connecting to our customers' meters in Union and Spartanburg Counties. Because we serve the town of Pacolet, South Carolina and the town of Jonesville, South Carolina as well as Union, South Carolina, we take safety and reliability very seriously.

When our area experiences an electrical outage, natural gas continues to flow because our natural gas system does not rely on the power grid to maintain natural gas supplies. Natural gas transmission service is provided by Williams Gas Pipeline, Transco Division. The transmission line is bilateral and not only flows from the Gulf but also from the north. The natural gas supplies move along the transmission line by compressor stations. These compressor stations in the Carolinas and Georgia have black start capability, which allows them to operate independently of the power grid.

The City of Union's natural gas system is engineered for reliability. Most of our facilities are underground and not impacted by inclement weather. We also have solar powered devices and backup generators for critical components on our natural gas system. The City of Union has off site storage at several locations on the east coast which we can pull an additional 3,278 dekatherms a day. We have interruptible industrial customers which we can call on to use alternate fuel during times of extremely cold weather conditions to maintain their normal operations.

If we compare the Texas storm of 2021 to the polar vortex we experienced in South Carolina in January 2018, the City of Union's natural gas system did not lose any customers during the 8 consecutive days as nightly lows remained in single digits and teens. This was one example of how robust our natural gas system is and how our employees maintain its integrity.

Our biggest threat to the natural gas system which would affect our customers is damage by third parties to our underground pipeline system, which occurs during excavation. We work with Palmetto Utility Protection Service, Inc. (PUPS) 811 to prevent this from occurring and we maintain utility locate personnel on staff to help protect our utilities.

The City of Union also uses BP Energy Corporation as our Asset Manager for natural gas supplies. Their managers have a wide variety of knowledge with supplying natural gas in difficult weather conditions.

The City of Union will continue to put safety and reliability upfront and as always make sure we adhere to all federal and state guidelines.

As always feel free to reach out to me for any additional information you need in this matter.

Sincerely,

Joe F. Nichols
City Administrator

Enclosure: City of Union DIMP Plan

cc: Benjamin P. Mustian